



The National Cattlemen's Beef Association (NCBA) appreciates the opportunity to provide scientific evidence to the Dietary Guidelines Advisory Committee (DGAC) regarding the Committee's lengthy discussion on meat during its 7th and final meeting.

The Committee's conclusion that lower red and processed meat intake are characteristic of dietary patterns associated with positive health outcomes blatantly ignores the evidence presented by the Committee itself. In the 6th public meeting, the Committee presented data clearly illustrating that most studies evaluating healthy dietary patterns have red and processed meat intake (g/1000 kcal) in or above the range of usual adult consumption as well as the range in the 2010 USDA Food Patterns. Therefore, recommending that Americans further reduce their red meat intake to achieve a healthy dietary pattern directly contradicts with the evidence reported by this Committee.

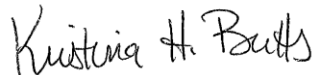
Furthermore, the egregious conclusion to remove lean meats from the common characteristics of dietary patterns associated with positive health outcomes is historic and unsubstantiated. It is inconsistent with more than three decades of scientific evidence on the benefits of lean meat in healthy diets and is also in direct conflict with all previous editions of the Dietary Guidelines for Americans. At least in part, it reflects the Committee's overreliance on observational data which is inherently limited by the inability to clearly disentangle the independent effects of red meat in dietary patterns evaluated. This is particularly concerning, considering numerous gold standard evidence from well-designed high quality randomized controlled trials are available to answer the question of lean meat's role in healthful dietary patterns, but are not being considered in the evidence base. For example, the rigorous Beef in an Optimal Lean Diet (BOLD) Study published by Roussell et al., in the American Journal of Clinical Nutrition in 2012 has been excluded based on an arbitrary decision.

The committee also appeared to be uninformed about current meat consumption and lacked a complete understanding of basic meat related definitions such as red meat, lean meat, lean red meat, etc. The decision to remove "lean meats" from the core components of a healthy dietary pattern were made after a hurried and muddled discussion that led to a private meeting in the midst of the 7th and final public meeting. The bottom line is that the Committee appears to be taking the path of least resistance rather than holding themselves accountable to the science.

The fact that protein and lean meat intakes are the only area of the existing guidelines currently consumed within the recommended amounts has been lost on this Committee. This is actually one of the few success stories of the Dietary Guidelines for Americans. In a direct response to public health guidance to choose lean meat, the meat supply has evolved to provide a wide array of nutrient rich lean meat options that are popular with the public. While meat, including red meat, remains a frequently consumed food, Americans have moderated their red meat intake over time. For example, total beef intake according to recent NHANES data, contributes about 5% of the calories and Americans are eating about 1.7 ounces of beef per day; an amount consistent with the 2010 Dietary Guidelines for Americans recommendations.

In summary, we believe that the Committee has lost their way with their conclusion and recommendations with respect to red and processed meat and the exclusion of lean meat in a healthy dietary pattern. This is inconsistent with the scientific evidence they publically presented, reversing more than 30 years of nutrition advice recommending Americans “go lean with protein.” While the Committee’s recommendations to the Secretaries should be an evidence-based process and the final Guidelines should reflect the totality of the science, key science was either not considered or ignored as part of this process. We respectfully request for the Committee to reconsider their conclusion from the 7th public meeting and include lean meats as a core component of a healthy dietary pattern, staying consistent with the 2010 (and previous) Dietary Guidelines for Americans.

Sincerely,

A handwritten signature in black ink that reads "Kristina H. Butts". The script is cursive and fluid, with the first name being the most prominent.

Kristina Butts
National Cattlemen’s Beef Association